U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT

I. HEADING

Date: March 13, 1998

From: Irmee Huhn, OSC, Region II
Removal Action Branch

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Subject: Pyridium Mercury Disposal Site No. 1 (Pyridium 1)
Village of Harriman, Orange County, New York

POLREP NO.: Three A (3A)

II. BACKGROUND

Site No.: EV
Response Authority: CERCLA
NPL Status: Non-NPL
State Notification: NYSDOH notified
Action Memo Status: Signed 09/29/95, 9/25/97 and 3/5/98
Start Date: 1/9/95, 9/30/97
Demobilization Date: 4/5/95, 3/15/98
Completion Date: 4/7/95, 3/15/98

III. SITE INFORMATION

A. Incident Category: Illegal dump

121271

B. Site Description

1. Site location

The Pyridium Mercury Disposal Site No. 1 (Pyridium 1)was a trailer park located at the intersection of State Route 17M and Harriman Heights Road in the Village of Harriman, Orange County, New York. Five mobile home trailers were located at the trailer park. All the trailers were occupied as residential dwellings.

A white clay-like material discovered at the trailer park, was used to fill low-lying areas of a wetland. This material was reportedly a waste product from the production of niacinamide by the Pyridium Corporation during the 1940's and 1950's. Nepera Inc. of Harriman, New York, currently occupies and operates the facility previously operated by the Pyridium Corporation.

B. Preliminary Assessment/Site Inspection Results

On October 20, 1994, the United States Environmental Protection Agency (EPA) collected a composite waste sample for waste characterization and mercury speciation. The sample was analyzed for Target Compound List (TCL) parameters, Target Analyte List (TAL) parameters and toxicity by the Toxicity Characteristic Leachate Procedure (TCLP).

Although the TCLP results are below regulatory limits, the TAL analytical results indicate the presence of mercury at an estimated concentration of 130 milligrams per kilogram (mg/kg). All the other compounds detected were below the New York State Department of Environmental Conservation (NYSDEC) recommended soil cleanup objectives.

Mercury speciation analytical results indicated that the sample contained no significant quantities of elemental mercury, mono-methyl mercury, or dimethyl mercury. When the sample was dissolved in an acid leach test, the mercury +2 ion leachate concentration was essentially the same as the total mercury concentration. Based on these results, the laboratory concluded that the sample was a chemical substrate contaminated with a mercuric or mercurous salt.

On November 17, 1994, the EPA Environmental Response Team (ERT) and the Response Engineering and Analytical Contractor (REAC) collected dust samples in each of the mobile homes at the trailer park. The analytical results of the dust sampling

indicated mercury concentrations ranging from 0.84 mg/kg to 26.8 mg/kg.

On November 28, 1994, Nepera, Inc. of Harriman, New York signed an Administrative Order on Consent (AOC) with EPA agreeing to fund relocation of the residents of the trailer park. Nepera has distributed relocation settlements to eligible residents. The amount of the settlement was based on federal relocation guidelines.

On January 9, 1995, verbal authorization was given by the EPA Director of the Emergency and Remedial Response Division to decontaminate, remove and dispose of the mobile homes, storage sheds and decks from the trailer park; disconnect water, sewer and electric utilities; remove heating oil and propane storage tanks; and fence the property and post warning signs. An Action Memorandum confirming verbal authorization was approved on February 27,1996. For specific details refer to Polreps 1-3.

IV. RESPONSE INFORMATION

A. Situation

1. Current situation

On September 25, 1997, an Action Memorandum was signed to install chain link fence and silt fence around the property and to cap areas of exposed waste. This action was authorized as an interim measure (pending the availability of money to fund a full removal action) to minimize the threat of direct contact with the waste on site. As the interim action was started, funding became available for the full action. Another Action Memorandum was prepared which authorized the excavation and disposal of waste from the Site. Therefore, this Polrep serves as the final Polrep for this interim action.

2. Removal actions to date

On September 30, 1997, the Emergency Response Cleanup Services contractor (ERCS) was mobilized for a kick off meeting at the site to discuss the repair or replacement of the security fence surrounding the property. On November 13, 1997, the Superfund Technical Assessment and Response Team (START)

conducted sampling around the site perimeter to determine if placement of the fence on the property boundary would encompass all the contamination. On November 13, ERCS conducted a bid walk with fence subcontractors to bid on fencing the property perimeter. Due to the overgrown vegetation at the Site, it was difficult to locate the property boundary stakes. On December 15-16, 1997 ERCS subcontracted a surveyor to stake the property boundary.

On March 13, 1998, EPA and START collected surface and subsurface soil samples to determine the extent of contamination. ERCS assisted with a powered post hole digger to obtain depth samples.

On March 13, 1998, ERCS demobilized the site ending this interim action. The interim action was not completed as funding became available to conduct the excavation and disposal of the waste, eliminating the need for a perimeter fence.

3. **Enforcement**

The Office of Regional Council is reviewing available site documentation to identify PRPs and will evaluate the viability of legal claims stated by Nepera.

B. Next Steps

A. Excavation and transportation and disposal of contaminated soil will begin for the Action Memorandum signed to excavate and dispose of the contaminated soil.

C. Key Issues

None

V. COST INFORMATION

The following are estimated costs for the removal action as of March 13, 1998:

	PROJECT CEILING	PREVIOUS COSTS	COSTS TO DATE	FUNDS REMAINING
ERCS Costs	$1,028,400	$51,000	~$3,000	$~974,400
START (TAT) Costs	$ 81,400	$11,000	$ 9,000	$61,400
Contingency	$ 209,500			$209,500
EPA Cost	$107,000	$9,000	$ 15,200	$82,800
TOTAL PROJECT CEILING	$1,426,300	$71,000	$27,200	$1,328,100

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure, which the EPA may include in any claims for cost recovery.